

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

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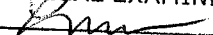
In The Matter of Charges and)
Complaint Against)
RALPH MARK CONTI, M.D.)
Respondent.)

Case No. 10-8692-1

FILED

OCT 11 2010

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: 

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners, composed at the time filing was approved of Charles N. Held, M.D., Theodore Berndt, M.D., and Ms. Valerie Clark, BSN, RHU, LUTCF, having a reasonable basis to believe that Ralph Mark Conti, M.D. hereinafter referred to as Dr. Conti, has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Dr. Conti is currently licensed in active status (License No. 6034), and has been so licensed since licensed on June 9, 1990 by the Nevada State Board of Medical Examiners pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. Pursuant to standard procedure, the Investigative Committee, through Board staff, requested Dr. Conti to provide a response and records related to a matter before the Committee. This initial request was made in June 2008.

3. Board staff was contacted shortly thereafter and was notified that Dr. Conti was represented by counsel.

4. In July 2009, counsel for Dr. Conti provided partial records and indicated that a response would be following shortly as well as additional records. No response or further records were ever received by the Investigative Committee or Board staff.

5 6. The ordered records were not provided nor was a response sent by Dr. Conti to the
6 Investigative Committee or Board staff.

7 7. On August 4, 2010, both Dr. Conti and his counsel were personally served with an
8 order to appear before the Investigative Committee on August 27, 2010 in Reno, Nevada to
9 explain why he had failed to comply with the May 12, 2010 order of the Investigative Committee
10 and previous attempts to secure a response and records. The Order also demanded that Dr. Conti
11 provide the requested records and response at the time of the meeting with the Investigative
12 Committee.

13 8. On the afternoon of August 26, 2010, counsel for Dr. Conti sent by fax a response
14 on behalf of Dr. Conti to the offices of the Board.

15 9. On August 27, 2010, counsel for Dr. Conti appeared before the Investigative
16 Committee, however, Dr. Conti was not present. Counsel for Dr. Conti indicated that he had
17 advised Dr. Conti he need not appear; however, the Investigative Committee at no time excused
18 Dr. Conti from his appearance.

Count I

10. NRS 630.3065(2)(a) provides that willful failure to comply with a regulation, subpoena or order of the Board or a committee designated by the Board to investigate a complaint against a physician is grounds for initiating disciplinary action against a physician.

23 11. Dr. Conti failed to comply with the order of the Investigative Committee served on
24 May 12, 2010, when he failed to provide the requested response or records.

25 12. Dr. Conti failed to comply with the order of the Investigative Committee served on
26 August 4, 2010, when he failed to appear before the Investigative Committee.

13. By reason of the foregoing, Dr. Conti is subject to discipline by the Nevada State Board of Medical Examiners as provided in NRS 630.352.

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1 **WHEREFORE**, the Investigative Committee prays:

2 1. That the Nevada State Board of Medical Examiners give Dr. Conti notice of the
3 charges herein against him and give him notice that he may file an answer to the Complaint herein
4 as set forth in Section 630.339 of the Nevada Revised Statutes within twenty (20) days of service
5 of the Complaint.

6 2. That the Nevada State Board of Medical Examiners set a time and place for a
7 formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

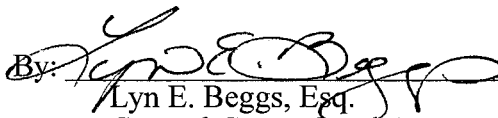
8 3. That the Nevada State Board of Medical Examiners determine what sanctions to
9 impose if it determines there has been a violation or violations of the Medical Practice Act
10 (Nevada Revised Statutes Chapter 630) committed by Dr. Conti; and

11 4. That the Nevada State Board of Medical Examiners make, issue and serve on
12 Dr. Conti its findings of facts, conclusions of law and order, in writing, that includes the sanctions
13 imposed; and

14 5. That the Nevada State Board of Medical Examiners take such other and further
15 action as may be just and proper in these premises.

16 DATED this 11th day of October, 2010.

17 THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

18
19 By: 

20 Lyn E. Beggs, Esq.

21 General Counsel and Attorney for the Investigative Committee
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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF DOUGLAS)

CHARLES N. HELD, M.D., having been duly sworn, hereby deposes and states under penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered in the course of the investigation into a complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

DATED this 11th day of October, 2010.




CHARLES N. HELD, M.D.

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 11th day of October 2010; I served a file copy of the COMPLAINT and Fingerprint Information, by mailing via USPS certified mail to the following:

James Rosenberger, Esq.
1916 S. Eastern Ave.
Las Vegas, NV 89104

Dated this 11th day of October 2010.



Angelia L. Donohoe
Legal Assistant